

1 Michael W. Sobol (SBN 194857)  
2 msobol@lchb.com  
3 David T. Rudolph (SBN 233457)  
4 drudolph@lchb.com  
5 Jallé H. Dafa (SBN 290637)  
6 jdafa@lchb.com  
7 John D. Maher (SBN 316157)  
8 jmaher@lchb.com  
9 Nabila Abdallah (SBN 347764)  
10 nabdallah@lchb.com  
11 Amelia A. Haselkorn (SBN 339633)  
12 ahaselkorn@lchb.com  
13 LIEFF CABRASER HEIMANN  
14 & BERNSTEIN, LLP  
15 275 Battery Street, 29th Floor  
16 San Francisco, CA 94111  
17 Telephone: 415.956.1000  
18 Facsimile: 415.956.1008

19 *Oracle's counsel on signature page*

20  
21  
22  
23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

12 Michael Katz-Lacabe and Dr. Jennifer  
13 Golbeck, on behalf of themselves and all  
14 others similarly situated,

15 Plaintiffs,

16 vs.

17 ORACLE AMERICA, INC., a corporation  
18 organized under the laws of the State of  
19 Delaware,

20 Defendant.

21 Case No. 3:22-cv-04792-RS

22  
23  
24  
25  
26  
27  
28  
**JOINT STIPULATION AND ORDER TO**  
**STAY DISCOVERY AND VACATE CASE**  
**DEADLINES**

Judge: Hon. Richard Seeborg

Dept: Courtroom: 3

Date Action Filed: August 19, 2022

Trial Date: None set

1 Pursuant to Civil Local Rules 7-12 and 6-2, Plaintiffs and Defendant Oracle America Inc.  
2 (“Oracle”) (collectively, the “Parties”), by and through their respective counsel of record, hereby  
3 stipulate as follows:

4 WHEREAS, on April 24, 2024, the Parties attended an arms-length mediation with a third-  
5 party neutral and have thereafter continued negotiations with the third-party neutral’s assistance;

6 WHEREAS, the Parties have now reached a classwide settlement in principle, subject to  
7 the approval of the Court;

8 WHEREAS, staying discovery in this matter and vacating all existing deadlines will  
9 preserve judicial resources and allow the Parties to focus their efforts on finalizing the settlement;

10 WHEREAS, the proposed stay will not prejudice any party and will serve the interests of  
11 judicial economy;

12 NOW, THEREFORE, subject to the approval of the Court, it is hereby stipulated and  
13 agreed that:

14 1. All existing hearings and case deadlines are vacated, including those concerning  
15 Plaintiffs’ motion to certify interlocutory appeal (Dkt. No. 120), but without prejudice to  
16 Plaintiffs renewing that motion should the prospective settlement not be approved;

17 2. The Parties anticipate they will finalize and execute a full-form settlement  
18 agreement on or before July 8, 2024;

19 3. Plaintiffs will file a motion for preliminary settlement approval promptly after the  
20 execution of a settlement agreement.

21  
22  
23  
24  
25  
26  
27  
28

1 Dated: May 9, 2024

2 */s/ Michael W. Sobol*  
3 Michael W. Sobol (SBN 194857)  
4 msobol@lchb.com  
5 David T. Rudolph (SBN 233457)  
6 drudolph@lchb.com  
7 Jallé H. Dafa (SBN 290637)  
8 jdafa@lchb.com  
9 John D. Maher (SBN 316157)  
10 jmaher@lchb.com  
11 Nabila Abdallah (SBN 347764)  
12 nabdallah@lchb.com  
13 Amelia A. Haselkorn (SBN 339633)  
14 ahaselkorn@lchb.com  
15 LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
16 275 Battery Street, 29th Floor  
17 San Francisco, CA 94111-3339  
18 Telephone: 415.956.1000  
19 Facsimile: 415.956.1008

20 *Attorneys for Plaintiffs and the Class*

21 Dated: May 9, 2024

22 */s/ Tiffany Cheung*  
23 Tiffany Cheung (CA SBN 211497)  
24 TCheung@mofo.com  
25 Christin Hill (CA SBN 247522)  
26 CHill@mofo.com  
27 MORRISON & FOERSTER LLP  
28 425 Market Street  
San Francisco, California 94105  
Telephone: 415.268.7000  
Facsimile: 415.268.7522

29 Purvi G. Patel (CA SBN 270702)  
30 PPatel@mofo.com  
31 Whitney O'Byrne (CA SBN 325698)  
32 WOByrne@mofo.com  
33 Erik Manukyan (CA SBN 340307)  
34 EManukyan@mofo.com  
35 Emma Burgoon (CA SBN 348097)  
36 EBurgoon@mofo.com  
37 MORRISON & FOERSTER LLP  
38 707 Wilshire Boulevard, Suite 6000  
39 Los Angeles, California 90017  
40 Telephone: 213.892.5200  
41 Facsimile: 213.892.5454

1 Zachary S. Newman (NY SBN 5651518)  
2 Admitted *pro hac vice*  
3 ZNewman@mofo.com  
4 MORRISON & FOERSTER LLP  
5 250 West 55th Street  
6 New York, New York 10019-9601  
7 Telephone: 212.468.8000  
8 Facsimile: 212.468.7900

9  
10 Kyle Zipes (CA SBN 251814)  
11 Kyle.Zipes@oracle.com  
12 Nargues M. Eder (CA SBN 260289)  
13 Nargues.M.Eder@oracle.com  
14 ORACLE AMERICA, INC.  
15 500 Oracle Parkway  
16 Redwood Shores, California 94065  
17 Telephone: 650.506.7000

18 *Attorneys for Defendant Oracle America, Inc.*

19 Pursuant to stipulation, **IT IS SO ORDERED.**

20 Dated: 5/10/2024

21  
22  
23  
24  
25  
26  
27  
28   
Honorable Richard Seeborg  
United States District Court Judge